UNITED STATES	DISTRI	CT CC	OURT
EASTERN DISTR	ICT OF	NEW '	YORK

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AMERICAN TRANSIT INSURANCE COMPANY,

Plaintiffs,

-against-

**Civil Action No.:** 1:24-cy-00360

BRADLEY PIERRE, MARVIN MOY, M.D., RUTLAND MEDICAL P.C., WILLIAM A. WEINER, D.O., NEXRAY MEDICAL IMAGING, P.C. d/b/a SOUL RADIOLOGY MEDICAL IMAGING and JOHN DOES 1-15,

ANSWER TO COMPLAINT

Defendants.

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Now comes the Defendants, WILLIAM A. WEINER, D.O., NEXRAY MEDICAL IMAGING, P.C. and d/b/a SOUL RADIOLOGY MEDICAL IMAGING, ("Answering Defendants") and interpose the following pleading as and for his Answer to Plaintiffs' Complaint in this matter.

- 1. The Answering Defendants deny the allegations contained in paragraph 1 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 2. The Answering Defendants deny the allegations contained in paragraph 2 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 3. The Answering Defendants deny the allegations contained in paragraph 3 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 4. The Answering Defendants deny the allegations contained in paragraph 4 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 5. The Answering Defendants deny the allegations contained in paragraph 5 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

- 6. The Answering Defendants deny the allegations contained in paragraph 6 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 7. The Answering Defendants deny the allegations contained in paragraph 7 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 8. The Answering Defendants deny the allegations contained in paragraph 8 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 9. The Answering Defendants deny the allegations contained in paragraph 9 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 10. The Answering Defendants deny the allegations contained in paragraph 10 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 11. The Answering Defendants deny the allegations contained in paragraph 11 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 12. The Answering Defendants deny the allegations contained in paragraph 12 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 13. The Answering Defendants deny the allegations contained in paragraph 13 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 14. The Answering Defendants deny the allegations contained in paragraph 14 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 15. The Answering Defendants deny the allegations contained in paragraph 15 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The

- 16. The Answering Defendants deny the allegations contained in paragraph 16 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 17. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 17 of the Complaint.
- 18. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 18 of the Complaint.
- 19. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 19 of the Complaint.
- 20. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 20 of the Complaint.
- 21. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 21 of the Complaint.
- 22. The Answering Defendants deny the allegations contained in paragraph 22 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 23. The Answering Defendants deny the allegations contained in paragraph 23 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 24. The Answering Defendants deny the allegations contained in paragraph 24 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 25. The Answering Defendants deny the allegations contained in paragraph 25 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 26. The Answering Defendants deny the allegations contained in paragraph 26 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

- 27. The Answering Defendants deny the allegations contained in paragraph 27 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 28. The Answering Defendants admit the allegations contained in paragraph 28 of the Plaintiff's Complaint.
- 29. The Answering Defendants deny the allegations contained in paragraph 29 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 30. The Answering Defendants deny the allegations contained in paragraph 30 of the Complaint and refers all to the relevant proceeding.
- 31. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 31 of the Complaint.
- 32. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 32 of the Complaint.
- 33. The Answering Defendants deny the allegations contained in paragraph 33 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 34. The Answering Defendants deny the allegations contained in paragraph 34 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 35. The Answering Defendants deny the allegations contained in paragraph 35 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 36. The Answering Defendants deny the allegations contained in paragraph 36 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 37. The Answering Defendants deny the allegations contained in paragraph 37 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

- 38. The Answering Defendants deny the allegations contained in paragraph 38 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 39. The Answering Defendants deny the allegations contained in paragraph 39 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 40. The Answering Defendants admit the allegations contained in paragraph 40 of the Plaintiff's Complaint.
- 41. The Answering Defendants admit the allegations contained in paragraph 41 of the Plaintiff's Complaint.
- 42. The Answering Defendants deny the allegations contained in paragraph 42 of the Complaint.
- 43. The Answering Defendants deny the allegations contained in paragraph 43 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 44. The Answering Defendants deny the allegations contained in paragraph 44 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 45. The Answering Defendants deny the allegations contained in paragraph 45 of the Complaint.
- 46. The Answering Defendants deny the allegations contained in paragraph 46 of the Complaint.
- 47. The Answering Defendants deny the allegations contained in paragraph 47 of the Complaint.
- 48. The Answering Defendants deny the allegations contained in paragraph 48 of the Complaint.
- 49. The Answering Defendants deny the allegations contained in paragraph 49 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
  - 50. The Answering Defendants deny the allegations contained in paragraph 50 of

the Complaint as legal conclusions to which no responsive pleading is required.

- 51. The Answering Defendants deny the allegations contained in paragraph 51 of the Complaint as legal conclusions to which no responsive pleading is required.
- 52. The Answering Defendants deny the allegations contained in paragraph 52 of the Complaint as legal conclusions to which no responsive pleading is required.
- 53. The Answering Defendants neither admit nor deny the allegations contained in paragraph 53 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.
- 54. The Answering Defendants neither admit nor deny the allegations contained in paragraph 54 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.
- 55. The Answering Defendants neither admit nor deny the allegations contained in paragraph 55 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.
- 56. The Answering Defendants neither admit nor deny the allegations contained in paragraph 56 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.
- 57. The Answering Defendants neither admit nor deny the allegations contained in paragraph 57 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.
- 58. The Answering Defendants neither admit nor deny the allegations contained in paragraph 58 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.
- 59. The Answering Defendants neither admit nor deny the allegations contained in paragraph 59 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.
- 60. The Answering Defendants neither admit nor deny the allegations contained in paragraph 60 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

- 61. The Answering Defendants neither admit nor deny the allegations contained in paragraph 61 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.
- 62. The Answering Defendants neither admit nor deny the allegations contained in paragraph 62 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.
- 63. The Answering Defendants neither admit nor deny the allegations contained in paragraph 63 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.
- 64. The Answering Defendants neither admit nor deny the allegations contained in paragraph 64 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.
- 65. The Answering Defendants neither admit nor deny the allegations contained in paragraph 65 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.
- 66. The Answering Defendants neither admit nor deny the allegations contained in paragraph 66 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.
- 67. The Answering Defendants neither admit nor deny the allegations contained in paragraph 67 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.
- 68. The Answering Defendants neither admit nor deny the allegations contained in paragraph 68 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.
- 69. The Answering Defendants neither admit nor deny the allegations contained in paragraph 69 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.
- 70. The Answering Defendants neither admit nor deny the allegations contained in paragraph 70 of the Plaintiffs' Complaint as the allegations purport to interpret New York

State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.

- 71. The Answering Defendants neither admit nor deny the allegations contained in paragraph 71 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.
- 72. The Answering Defendants neither admit nor deny the allegations contained in paragraph 72 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.
- 73. The Answering Defendants neither admit nor deny the allegations contained in paragraph 73 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.
- 74. The Answering Defendants deny the allegations contained in paragraph 74 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 75. The Answering Defendants deny the allegations contained in paragraph 75 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 76. The Answering Defendants deny the allegations contained in paragraph 76 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 77. The Answering Defendants deny the allegations contained in paragraph 77 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 78. The Answering Defendants deny the allegations contained in paragraph 78 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 79. The Answering Defendants deny the allegations contained in paragraph 79 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

- 80. The Answering Defendants deny the allegations contained in paragraph 80 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 81. The Answering Defendants deny the allegations contained in paragraph 81 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 82. The Answering Defendants deny the allegations contained in paragraph 82 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 83. The Answering Defendants deny the allegations contained in paragraph 83 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 84. The Answering Defendants deny the allegations contained in paragraph 84 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 85. The Answering Defendants deny the allegations contained in paragraph 85 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 86. The Answering Defendants deny the allegations contained in paragraph 86 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 87. The Answering Defendants deny the allegations contained in paragraph 87 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 88. The Answering Defendants deny the allegations contained in paragraph 88 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 89. The Answering Defendants deny the allegations contained in paragraph 89 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The

- 90. The Answering Defendants deny the allegations contained in paragraph 90 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 91. The Answering Defendants deny the allegations contained in paragraph 91 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 92. The Answering Defendants deny the allegations contained in paragraph 92 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 93. The Answering Defendants deny the allegations contained in paragraph 93 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 94. The Answering Defendants deny the allegations contained in paragraph 94 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 95. The Answering Defendants deny the allegations contained in paragraph 95 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 96. The Answering Defendants deny the allegations contained in paragraph 96 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 97. The Answering Defendants deny the allegations contained in paragraph 97 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 98. The Answering Defendants deny the allegations contained in paragraph 98 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

- 99. The Answering Defendants deny the allegations contained in paragraph 99 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 100. The Answering Defendants deny the allegations contained in paragraph 100 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 101. The Answering Defendants deny the allegations contained in paragraph 101 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 102. The Answering Defendants deny the allegations contained in paragraph 102 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 103. The Answering Defendants deny the allegations contained in paragraph 103 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 104. The Answering Defendants deny the allegations contained in paragraph 104 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 105. The Answering Defendants deny the allegations contained in paragraph 105 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 106. The Answering Defendants neither admit nor deny the allegations contained in paragraph 106 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 107. The Answering Defendants deny the allegations contained in paragraph 107 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 108. The Answering Defendants deny the allegations contained in paragraph 108 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the

- 109. The Answering Defendants deny the allegations contained in paragraph 109 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 110. The Answering Defendants deny the allegations contained in paragraph 110 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 111. The Answering Defendants neither admit nor deny the allegations contained in paragraph 111 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 112. The Answering Defendants neither admit nor deny the allegations contained in paragraph 112 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 113. The Answering Defendants neither admit nor deny the allegations contained in paragraph 113 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 114. The Answering Defendants neither admit nor deny the allegations contained in paragraph 114 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 115. The Answering Defendants neither admit nor deny the allegations contained in paragraph 115 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 116. The Answering Defendants neither admit nor deny the allegations contained in paragraph 116 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 117. The Answering Defendants deny the allegations contained in paragraph 1 17 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 118. The Answering Defendants deny the allegations contained in paragraph 118 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
  - 119. The Answering Defendants deny the allegations contained in paragraph 119

- 120. The Answering Defendants deny the allegations contained in paragraph 120 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 121. The Answering Defendants deny the allegations contained in paragraph 121 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 122. The Answering Defendants deny the allegations contained in paragraph 122 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 123. The Answering Defendants deny the allegations contained in paragraph 123 of the Complaint.
- 124. The Answering Defendants deny the allegations contained in paragraph 124 of the Complaint.
- 125. The Answering Defendants neither admit nor deny the allegations contained in paragraph 125 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 126. The Answering Defendants neither admit nor deny the allegations contained in paragraph 126 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 127. The Answering Defendants neither admit nor deny the allegations contained in paragraph 127 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 128. The Answering Defendants neither admit nor deny the allegations contained in paragraph 128 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 129. The Answering Defendants neither admit nor deny the allegations contained in paragraph 129 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 130. The Answering Defendants neither admit nor deny the allegations contained in paragraph 130 of the Plaintiffs' Complaint as the allegations purport to expound and

interpret medical, scientific and/or clinical information and guidelines.

- 131. The Answering Defendants neither admit nor deny the allegations contained in paragraph 131 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 132. The Answering Defendants deny the allegations contained in paragraph 132 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 133. The Answering Defendants deny the allegations contained in paragraph 133 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 134. The Answering Defendants deny the allegations contained in paragraph 134 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 135. The Answering Defendants deny the allegations contained in paragraph 135 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 136. The Answering Defendants deny the allegations contained in paragraph 136 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 137. The Answering Defendants deny the allegations contained in paragraph 137 of the Complaint.
- 138. The Answering Defendants deny the allegations contained in paragraph 138 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 139. The Answering Defendants neither admit nor deny the allegations contained in paragraph 139 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 140. The Answering Defendants neither admit nor deny the allegations contained in paragraph 140 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

- 141. The Answering Defendants neither admit nor deny the allegations contained in paragraph 141 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 142. The Answering Defendants neither admit nor deny the allegations contained in paragraph 142 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 143. The Answering Defendants neither admit nor deny the allegations contained in paragraph 143 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 144. The Answering Defendants deny the allegations contained in paragraph 144 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 145. The Answering Defendants deny the allegations contained in paragraph 145 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 146. The Answering Defendants deny the allegations contained in paragraph 146 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 147. The Answering Defendants deny the allegations contained in paragraph 147 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 148. The Answering Defendants deny the allegations contained in paragraph 148 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 149. The Answering Defendants deny the allegations contained in paragraph 149 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 150. The Answering Defendants deny the allegations contained in paragraph 150 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

- 151. The Answering Defendants deny the allegations contained in paragraph 151 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 152. The Answering Defendants deny the allegations contained in paragraph 152 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 153. The Answering Defendants deny the allegations contained in paragraph 153 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 154. The Answering Defendants neither admit nor deny the allegations contained in paragraph 154 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 155. The Answering Defendants neither admit nor deny the allegations contained in paragraph 155 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 156. The Answering Defendants deny the allegations contained in paragraph 156 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 157. The Answering Defendants deny the allegations contained in paragraph 157 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 158. The Answering Defendants deny the allegations contained in paragraph 158 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 159. The Answering Defendants deny the allegations contained in paragraph 159 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 160. The Answering Defendants deny the allegations contained in paragraph 160 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

- 161. The Answering Defendants deny the allegations contained in paragraph 161 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 162. The Answering Defendants neither admit nor deny the allegations contained in paragraph 162 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 163. The Answering Defendants neither admit nor deny the allegations contained in paragraph 163 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 164. The Answering Defendants deny the allegations contained in paragraph 164 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 165. The Answering Defendants deny the allegations contained in paragraph 165 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 166. The Answering Defendants deny the allegations contained in paragraph 166 of the Complaint.
- 167. The Answering Defendants deny the allegations contained in paragraph 167 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 168. The Answering Defendants neither admit nor deny the allegations contained in paragraph 168 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 169. The Answering Defendants neither admit nor deny the allegations contained in paragraph 169 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 170. The Answering Defendants neither admit nor deny the allegations contained in paragraph 170 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 171. The Answering Defendants neither admit nor deny the allegations contained in paragraph 171 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.

- 172. The Answering Defendants neither admit nor deny the allegations contained in paragraph 172 of the Plaintiffs' Complaint as the allegations purport to expound and interpret medical, scientific and/or clinical information and guidelines.
- 173. The Answering Defendants deny the allegations contained in paragraph 173 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 174. The Answering Defendants deny the allegations contained in paragraph 174 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 175. The Answering Defendants deny the allegations contained in paragraph 175 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 176. The Answering Defendants deny the allegations contained in paragraph 176 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 177. The Answering Defendants deny the allegations contained in paragraph 177 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 178. The Answering Defendants deny the allegations contained in paragraph 178 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 179. The Answering Defendants deny the allegations contained in paragraph 179 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 180. The Answering Defendants deny the allegations contained in paragraph 180 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 181. The Answering Defendants deny the allegations contained in paragraph 181 of the Complaint.

- 182. The Answering Defendants deny the allegations contained in paragraph 182 of the Complaint.
- 183. The Answering Defendants deny the allegations contained in paragraph 183 of the Complaint.
- 184. The Answering Defendants deny the allegations contained in paragraph 184 of the Complaint.
- 185. The Answering Defendants deny the allegations contained in paragraph 185 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 186. The Answering Defendants deny the allegations contained in paragraph 186 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 187. The Answering Defendants deny the allegations contained in paragraph 187 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 188. The Answering Defendants deny the allegations contained in paragraph 188 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 189. The Answering Defendants deny the allegations contained in paragraph 189 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 190. The Answering Defendants deny the allegations contained in paragraph 190 of the Complaint.
- 191. The Answering Defendants deny the allegations contained in paragraph 191 of the Complaint.
- 192. The Answering Defendants deny the allegations contained in paragraph 192 of the Complaint.
- 193. The Answering Defendants deny the allegations contained in paragraph 193 of the Complaint.
  - 194. The Answering Defendants deny information sufficient to form a belief as to

the allegations contained in paragraph 194 of the Complaint.

- 195. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 195 of the Complaint.
- 196. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 196 of the Complaint.
- 197. The Answering Defendants deny the allegations contained in paragraph 197 of the Complaint.
- 198. The Answering Defendants deny the allegations contained in paragraph 198 of the Complaint.
- 199. The Answering Defendants deny the allegations contained in paragraph 199 of the Complaint.
- 200. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 200 of the Complaint.
- 201. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 201 of the Complaint.
- 202. The Answering Defendants deny the allegations contained in paragraph 202 of the Complaint.
- 203. The Answering Defendants deny the allegations contained in paragraph 203 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 204. The Answering Defendants deny the allegations contained in paragraph 204 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 205. The Answering Defendants deny the allegations contained in paragraph 205 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 206. The Answering Defendants deny the allegations contained in paragraph 206 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
  - 207. The Answering Defendants deny the allegations contained in paragraph 207

- 208. The Answering Defendants deny the allegations contained in paragraph 208 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 209. The Answering Defendants deny the allegations contained in paragraph 209 of the Complaint.
- 210. The Answering Defendants deny the allegations contained in paragraph 210 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 211. The Answering Defendants deny the allegations contained in paragraph 211 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 212. The Answering Defendants deny the allegations contained in paragraph 212 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 213. The Answering Defendants deny the allegations contained in paragraph 213 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 214. The Answering Defendants deny the allegations contained in paragraph 214 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 215. The Answering Defendants deny the allegations contained in paragraph 215 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 216. The Answering Defendants deny the allegations contained in paragraph 216 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

- 217. The Answering Defendants deny the allegations contained in paragraph 217 of the Complaint.
- 218. The Answering Defendants deny the allegations contained in paragraph 218 of the Complaint.
- 219. The Answering Defendants deny the allegations contained in paragraph 219 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 220. The Answering Defendants deny the allegations contained in paragraph 220 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 221. The Answering Defendants deny the allegations contained in paragraph 221 of the Complaint.
- 222. The Answering Defendants deny the allegations contained in paragraph 222 of the Complaint.
- 223. The Answering Defendants deny the allegations contained in paragraph 223 of the Complaint.
- 224. The Answering Defendants deny the allegations contained in paragraph 224 of the Complaint.
- 225. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 225 of the Complaint.
- 226. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 226 of the Complaint.
- 227. The Answering Defendants deny the allegations contained in paragraph 227 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 228. The Answering Defendants deny the allegations contained in paragraph 228 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 229. The Answering Defendants deny the allegations contained in paragraph 229 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the

- 230. The Answering Defendants deny the allegations contained in paragraph 230 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 231. The Answering Defendants deny the allegations contained in paragraph 231 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 232. The Answering Defendants deny the allegations contained in paragraph 232 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 233. The Answering Defendants deny the allegations contained in paragraph 233 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 234. The Answering Defendants deny the allegations contained in paragraph 234 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 235. The Answering Defendants deny the allegations contained in paragraph 235 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 236. The Answering Defendants deny the allegations contained in paragraph 236 of the Complaint.
- 237. The Answering Defendants deny the allegations contained in paragraph 237 of the Complaint.
- 238. The Answering Defendants deny the allegations contained in paragraph 238 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 239. The Answering Defendants deny the allegations contained in paragraph 239 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

- 240. The Answering Defendants deny the allegations contained in paragraph 240 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 241. The Answering Defendants deny the allegations contained in paragraph 241 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 242. The Answering Defendants deny the allegations contained in paragraph 242 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 243. The Answering Defendants deny the allegations contained in paragraph 243 of the Complaint.
- 244. The Answering Defendants deny the allegations contained in paragraph 244 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 245. The Answering Defendants deny the allegations contained in paragraph 245 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 246. The Answering Defendants deny the allegations contained in paragraph 246 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 247. The Answering Defendants deny the allegations contained in paragraph 247 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 248. The Answering Defendants deny the allegations contained in paragraph 248 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 249. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 249 of the Complaint.
  - 250. The Answering Defendants deny information sufficient to form a belief as to

the allegations contained in paragraph 250 of the Complaint.

- 251. The Answering Defendants deny the allegations contained in paragraph 251 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 252. The Answering Defendants deny the allegations contained in paragraph 252 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 253. The Answering Defendants deny the allegations contained in paragraph 253 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 254. The Answering Defendants deny the allegations contained in paragraph 254 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 255. The Answering Defendants deny the allegations contained in paragraph 255 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 256. The Answering Defendants deny the allegations contained in paragraph 256 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 257. The Answering Defendants deny the allegations contained in paragraph 257 of the Complaint.
- 258. The Answering Defendants deny the allegations contained in paragraph 258 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 259. The Answering Defendants deny the allegations contained in paragraph 259 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 260. The Answering Defendants deny the allegations contained in paragraph 260 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The

- 261. The Answering Defendants deny the allegations contained in paragraph 261 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 262. The Answering Defendants deny the allegations contained in paragraph 262 of the Complaint.
- 263. The Answering Defendants deny the allegations contained in paragraph 263 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 264. The Answering Defendants deny the allegations contained in paragraph 264 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 265. The Answering Defendants deny the allegations contained in paragraph 265 of the Complaint.
- 266. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 266 of the Complaint.
- 267. The Answering Defendants deny the allegations contained in paragraph 267 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 268. The Answering Defendants deny the allegations contained in paragraph 268 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 269. The Answering Defendants deny the allegations contained in paragraph 269 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 270. The Answering Defendants deny the allegations contained in paragraph 270 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

- 271. The Answering Defendants deny the allegations contained in paragraph 271 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 272. The Answering Defendants deny the allegations contained in paragraph 272 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 273. The Answering Defendants deny the allegations contained in paragraph 273 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 274. The Answering Defendants deny the allegations contained in paragraph 274 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 275. The Answering Defendants deny the allegations contained in paragraph 275 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 276. The Answering Defendants deny the allegations contained in paragraph 276 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 277. The Answering Defendants deny the allegations contained in paragraph 277 of the Complaint.
- 278. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 278 of the Complaint.
- 279. The Answering Defendants deny the allegations contained in paragraph 279 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 280. The Answering Defendants deny the allegations contained in paragraph 280 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
  - 281. The Answering Defendants deny the allegations contained in paragraph 281

- 282. The Answering Defendants deny the allegations contained in paragraph 282 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 283. The Answering Defendants deny the allegations contained in paragraph 283 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 284. The Answering Defendants deny the allegations contained in paragraph 284 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 285. The Answering Defendants deny the allegations contained in paragraph 285 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 286. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 286 of the Complaint.
- 287. The Answering Defendants deny the allegations contained in paragraph 287 of the Complaint.
- 288. The Answering Defendants deny the allegations contained in paragraph 288 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 289. The Answering Defendants deny the allegations contained in paragraph 289 of the Complaint.
- 290. The Answering Defendants deny the allegations contained in paragraph 290 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 291. The Answering Defendants deny the allegations contained in paragraph 291 of the Complaint.
  - 292. The Answering Defendants deny the allegations contained in paragraph 292

- 293. The Answering Defendants deny the allegations contained in paragraph 293 of the Complaint.
- 294. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 294 of the Complaint.
- 295. The Answering Defendants deny the allegations contained in paragraph 295 of the Complaint.
- 296. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 296 of the Complaint.
- 297. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 297 of the Complaint.
- 298. The Answering Defendants deny the allegations contained in paragraph 298 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 299. The Answering Defendants deny the allegations contained in paragraph 299 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 300. The Answering Defendants deny the allegations contained in paragraph 300 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 301. The Answering Defendants deny the allegations contained in paragraph 301 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 302. The Answering Defendants deny the allegations contained in paragraph 302 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 303. The Answering Defendants deny the allegations contained in paragraph 303 of the Complaint.

- 304. The Answering Defendants deny the allegations contained in paragraph 304 of the Complaint.
- 305. The Answering Defendants deny the allegations contained in paragraph 305 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 306. The Answering Defendants deny the allegations contained in paragraph 306 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 307. The Answering Defendants deny the allegations contained in paragraph 307 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 308. The Answering Defendants deny the allegations contained in paragraph 308 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 309. The Answering Defendants deny the allegations contained in paragraph 309 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 310. The Answering Defendants deny the allegations contained in paragraph 310 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 311. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 311 of the Complaint.
- 312. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 312 of the Complaint.
- 313. The Answering Defendants deny the allegations contained in paragraph 313 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 314. The Answering Defendants deny the allegations contained in paragraph 314 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the

- 315. The Answering Defendants deny the allegations contained in paragraph 315 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 316. The Answering Defendants deny the allegations contained in paragraph 316 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 317. The Answering Defendants deny the allegations contained in paragraph 317 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 318. The Answering Defendants deny the allegations contained in paragraph 318 of the Complaint.
- 319. The Answering Defendants deny the allegations contained in paragraph 319 of the Complaint.
- 320. The Answering Defendants deny the allegations contained in paragraph 320 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 321. The Answering Defendants deny the allegations contained in paragraph 321 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 322. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 322 of the Complaint.
- 323. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 323 of the Complaint.
- 324. The Answering Defendants deny the allegations contained in paragraph 324 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 325. The Answering Defendants deny the allegations contained in paragraph 325 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the

- 326. The Answering Defendants deny the allegations contained in paragraph 326 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 327. The Answering Defendants deny the allegations contained in paragraph 327 of the Complaint.
- 328. The Answering Defendants deny the allegations contained in paragraph 328 of the Complaint.
- 329. The Answering Defendants deny the allegations contained in paragraph 329 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 330. The Answering Defendants deny the allegations contained in paragraph 330 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 331. The Answering Defendants deny the allegations contained in paragraph 331 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 332. The Answering Defendants deny the allegations contained in paragraph 332 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 333. The Answering Defendants deny the allegations contained in paragraph 333 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 334. The Answering Defendants deny the allegations contained in paragraph 334 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 335. The Answering Defendants deny the allegations contained in paragraph 335 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

- 336. The Answering Defendants deny the allegations contained in paragraph 336 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 337. The Answering Defendants deny the allegations contained in paragraph 337 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 338. The Answering Defendants deny the allegations contained in paragraph 338 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 339. The Answering Defendants deny the allegations contained in paragraph 339 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 340. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 340 of the Complaint.
- 341. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 341 of the Complaint.
- 342. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 342 of the Complaint.
- 343. The Answering Defendants deny the allegations contained in paragraph 343 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 344. The Answering Defendants deny the allegations contained in paragraph 344 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 345. The Answering Defendants deny the allegations contained in paragraph 345 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 346. The Answering Defendants deny the allegations contained in paragraph 346 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the

- 347. The Answering Defendants deny the allegations contained in paragraph 347 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 348. The Answering Defendants deny the allegations contained in paragraph 348 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 349. The Answering Defendants deny the allegations contained in paragraph 349 of the Complaint.
- 350. The Answering Defendants deny the allegations contained in paragraph 350 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 351. The Answering Defendants deny the allegations contained in paragraph 351 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 352. The Answering Defendants deny the allegations contained in paragraph 352 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 353. The Answering Defendants deny the allegations contained in paragraph 353 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 354. The Answering Defendants deny the allegations contained in paragraph 354 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 355. The Answering Defendants deny the allegations contained in paragraph 355 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 356. The Answering Defendants deny the allegations contained in paragraph 356 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The

- 357. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 357 of the Complaint.
- 358. The Answering Defendants deny information sufficient to form a belief as to the allegations contained in paragraph 358 of the Complaint.
- 359. The Answering Defendants deny the allegations contained in paragraph 359 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 360. The Answering Defendants deny the allegations contained in paragraph 360 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 361. The Answering Defendants deny the allegations contained in paragraph 361 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 362. The Answering Defendants deny the allegations contained in paragraph 362 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 363. The Answering Defendants deny the allegations contained in paragraph 363 of the Complaint.
- 364. The Answering Defendants deny the allegations contained in paragraph 364 of the Complaint.
- 365. The Answering Defendants deny the allegations contained in paragraph 365 of the Complaint.
- 366. The Answering Defendants deny the allegations contained in paragraph 366 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 367. The Answering Defendants deny the allegations contained in paragraph 367 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

- 368. The Answering Defendants deny the allegations contained in paragraph 368 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 369. The Answering Defendants deny the allegations contained in paragraph 369 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 370. The Answering Defendants deny the allegations contained in paragraph 370 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 371. The Answering Defendants deny the allegations contained in paragraph 371 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 372. The Answering Defendants deny the allegations contained in paragraph 372 of the Complaint.
- 373. The Answering Defendants deny the allegations contained in paragraph 373 of the Complaint.
- 374. The Answering Defendants deny the allegations contained in paragraph 374 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 375. The Answering Defendants deny the allegations contained in paragraph 375 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 376. The Answering Defendants deny the allegations contained in paragraph 376 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 377. The Answering Defendants deny the allegations contained in paragraph 377 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
  - 378. The Answering Defendants deny the allegations contained in paragraph 378

of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

- 379. The Answering Defendants deny the allegations contained in paragraph 379 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 380. The Answering Defendants deny the allegations contained in paragraph 380 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 381. The Answering Defendants deny the allegations contained in paragraph 381 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 382. The Answering Defendants deny the allegations contained in paragraph 382 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 383. The Answering Defendants deny the allegations contained in paragraph 383 of the Complaint as legal conclusions to which no responsive pleading is required.
- 384. The Answering Defendants deny the allegations contained in paragraph 384 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 385. The Answering Defendants deny the allegations contained in paragraph 385 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 386. The Answering Defendants deny the allegations contained in paragraph 386 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 387. The Answering Defendants deny the allegations contained in paragraph 387 of the Complaint.
- 388. The Answering Defendants deny the allegations contained in paragraph 388 of the Complaint.

- 389. The Answering Defendants deny the allegations contained in paragraph 389 of the Complaint.
- 390. The Answering Defendants deny the allegations contained in paragraph 390 of the Complaint.
- 391. The Answering Defendants deny the allegations contained in paragraph 391 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 392. The Answering Defendants deny the allegations contained in paragraph 392 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 393. The Answering Defendants deny the allegations contained in paragraph 393 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 394. The Answering Defendants deny the allegations contained in paragraph 394 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 395. The Answering Defendants deny the allegations contained in paragraph 395 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 396. The Answering Defendants deny the allegations contained in paragraph 396 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 397. The Answering Defendants deny the allegations contained in paragraph 397 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 398. The Answering Defendants deny the allegations contained in paragraph 398 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
  - 399. The Answering Defendants deny the allegations contained in paragraph 399

of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

- 400. The Answering Defendants deny the allegations contained in paragraph 400 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 401. The Answering Defendants deny the allegations contained in paragraph 401 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 402. The Answering Defendants deny the allegations contained in paragraph 402 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 403. The Answering Defendants deny the allegations contained in paragraph 403 of the Complaint.
- 404. The Answering Defendants deny the allegations contained in paragraph 404 of the Complaint.
- $405.\;\;$  The Answering Defendants deny the allegations contained in paragraph 405 of the Complaint.
- 406. The Answering Defendants deny the allegations contained in paragraph 406 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 407. The Answering Defendants deny the allegations contained in paragraph 407 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 408. The Answering Defendants deny the allegations contained in paragraph 408 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 409. The Answering Defendants deny the allegations contained in paragraph 409 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

- 410. The Answering Defendants deny the allegations contained in paragraph 410 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 411. The Answering Defendants deny the allegations contained in paragraph 411 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 412. The Answering Defendants deny the allegations contained in paragraph 412 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 413. The Answering Defendants deny the allegations contained in paragraph 413 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 414. The Answering Defendants deny the allegations contained in paragraph 414 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 415. The Answering Defendants deny the allegations contained in paragraph 415 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 416. The Answering Defendants deny the allegations contained in paragraph 416 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 417. The Answering Defendants deny the allegations contained in paragraph 417 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 418. The Answering Defendants deny the allegations contained in paragraph 418 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 419. The Answering Defendants deny the allegations contained in paragraph 419 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The

- 420. The Answering Defendants deny the allegations contained in paragraph 420 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 421. The Answering Defendants deny the allegations contained in paragraph 421 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 422. The Answering Defendants deny the allegations contained in paragraph 422 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 423. The Answering Defendants deny the allegations contained in paragraph 423 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 424. The Answering Defendants deny the allegations contained in paragraph 424 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 425. The Answering Defendants deny the allegations contained in paragraph 425 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 426. The Answering Defendants deny the allegations contained in paragraph 426 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 427. The Answering Defendants deny the allegations contained in paragraph 427 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 428. The Answering Defendants deny the allegations contained in paragraph 428 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

- 429. The Answering Defendants neither admit nor deny the allegations contained in paragraph 429 of the Plaintiffs' Complaint as the allegations purport to interpret New York State Law, the New York State No-fault laws and regulations and/or the Worker's Compensation Fee Schedule.
- 430. The Answering Defendants deny the allegations contained in paragraph 430 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 431. The Answering Defendants deny the allegations contained in paragraph 431 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 432. The Answering Defendants deny the allegations contained in paragraph 432 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 433. The Answering Defendants deny the allegations contained in paragraph 433 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 434. The Answering Defendants deny the allegations contained in paragraph 434 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 435. The Answering Defendants deny the allegations contained in paragraph 435 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 436. The Answering Defendants deny the allegations contained in paragraph 436 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 437. The Answering Defendants deny the allegations contained in paragraph 437 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 438. The Answering Defendants deny the allegations contained in paragraph 438 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The

- 439. The Answering Defendants deny the allegations contained in paragraph 439 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 440. The Answering Defendants deny the allegations contained in paragraph 440 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 441. The Answering Defendants deny the allegations contained in paragraph 441 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 442. The Answering Defendants deny the allegations contained in paragraph 442 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 443. The Answering Defendants deny the allegations contained in paragraph 443 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 444. The Answering Defendants deny the allegations contained in paragraph 444 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 445. The Answering Defendants deny the allegations contained in paragraph 445 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 446. The Answering Defendants deny the allegations contained in paragraph 446 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 447. The Answering Defendants deny the allegations contained in paragraph 447 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

- 448. The Answering Defendants deny the allegations contained in paragraph 448 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 449. The Answering Defendants deny the allegations contained in paragraph 449 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 450. The Answering Defendants deny the allegations contained in paragraph 450 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 451. The Answering Defendants deny the allegations contained in paragraph 451 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 452. The Answering Defendants deny the allegations contained in paragraph 452 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 453. The Answering Defendants deny the allegations contained in paragraph 453 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 454. The Answering Defendants deny the allegations contained in paragraph 454 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 455. The Answering Defendants deny the allegations contained in paragraph 455 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 456. The Answering Defendants deny the allegations contained in paragraph 456 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 457. The Answering Defendants deny the allegations contained in paragraph 457 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The

- 458. The Answering Defendants deny the allegations contained in paragraph 458 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 459. The Answering Defendants incorporate, as though fully set forth herein, each and every answer set forth in the foregoing paragraphs.
- 460. The Answering Defendants deny the allegations contained in paragraph 460 of the Complaint.
- 461. The Answering Defendants deny the allegations contained in paragraph 461 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 462. The Answering Defendants deny the allegations contained in paragraph 462 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 463. The Answering Defendants deny the allegations contained in paragraph 463 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 464. The Answering Defendants deny the allegations contained in paragraph 464 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 465. The Answering Defendants deny the allegations contained in paragraph 465 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 466. The Answering Defendants incorporate, as though fully set forth herein, each and every answer set forth in the foregoing paragraphs.
- 467. The Answering Defendants deny the allegations contained in paragraph 467 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

- 468. The Answering Defendants deny the allegations contained in paragraph 468 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 469. The Answering Defendants deny the allegations contained in paragraph 469 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 470. The Answering Defendants deny the allegations contained in paragraph 470 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 471. The Answering Defendants deny the allegations contained in paragraph 471 of the Complaint.
- 472. The Answering Defendants deny the allegations contained in paragraph 472 of the Complaint.
- 473. The Answering Defendants incorporate, as though fully set forth herein, each and every answer set forth in the foregoing paragraphs.
- 474. The Answering Defendants deny the allegations contained in paragraph 474 of the Complaint.
- 475. The Answering Defendants deny the allegations contained in paragraph 475 of the Complaint.
- 476. The Answering Defendants deny the allegations contained in paragraph 476 of the Complaint.
- 477. The Answering Defendants deny the allegations contained in paragraph 477 of the Complaint.
- 478. The Answering Defendants deny the allegations contained in paragraph 478 of the Complaint.
- 479. The Answering Defendants deny the allegations contained in paragraph 479 of the Complaint.
- 480. The Answering Defendants incorporate, as though fully set forth herein, each and every answer set forth in the foregoing paragraphs.
- 481. The Answering Defendants deny the allegations contained in paragraph 481 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The

- 482. The Answering Defendants deny the allegations contained in paragraph 482 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 483. The Answering Defendants deny the allegations contained in paragraph 483 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 484. The Answering Defendants deny the allegations contained in paragraph 484 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 485. The Answering Defendants deny the allegations contained in paragraph 485 of the Complaint.
- 486. The Answering Defendants deny the allegations contained in paragraph 486 of the Complaint.
- 487. The Answering Defendants incorporate, as though fully set forth herein, each and every answer set forth in the foregoing paragraphs.
- 488. The Answering Defendants deny the allegations contained in paragraph 488 of the Complaint.
- 489. The Answering Defendants deny the allegations contained in paragraph 489 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 490. The Answering Defendants deny the allegations contained in paragraph 490 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 491. The Answering Defendants deny the allegations contained in paragraph 491 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 492. The Answering Defendants deny the allegations contained in paragraph 492 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The

- 493. The Answering Defendants deny the allegations contained in paragraph 493 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 494. The Answering Defendants incorporate, as though fully set forth herein, each and every answer set forth in the foregoing paragraphs.
- 495. The Answering Defendants deny the allegations contained in paragraph 495 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 496. The Answering Defendants deny the allegations contained in paragraph 496 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 497. The Answering Defendants deny the allegations contained in paragraph 497 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 498. The Answering Defendants deny the allegations contained in paragraph 498 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 499. The Answering Defendants deny the allegations contained in paragraph 499 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 500. The Answering Defendants deny the allegations contained in paragraph 500 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- $501.\;\;$  The Answering Defendants deny the allegations contained in paragraph 501 of the Complaint.
- 502. The Answering Defendants incorporate, as though fully set forth herein, each and every answer set forth in the foregoing paragraphs.

- 503. The Answering Defendants deny the allegations contained in paragraph 503 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 504. The Answering Defendants deny the allegations contained in paragraph 504 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 505. The Answering Defendants deny the allegations contained in paragraph 505 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 506. The Answering Defendants deny the allegations contained in paragraph 506 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 507. The Answering Defendants deny the allegations contained in paragraph 507 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 508. The Answering Defendants deny the allegations contained in paragraph 508 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 509. The Answering Defendants deny the allegations contained in paragraph 509 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 510. The Answering Defendants deny the allegations contained in paragraph 510 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 511. The Answering Defendants incorporate, as though fully set forth herein, each and every answer set forth in the foregoing paragraphs.
- 512. The Answering Defendants deny the allegations contained in paragraph 512 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

- 513. The Answering Defendants deny the allegations contained in paragraph 513 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 514. The Answering Defendants deny the allegations contained in paragraph 514 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 515. The Answering Defendants deny the allegations contained in paragraph 515 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 516. The Answering Defendants deny the allegations contained in paragraph 516 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 517. The Answering Defendants deny the allegations contained in paragraph 517 of the Complaint.
- 518. The Answering Defendants incorporate, as though fully set forth herein, each and every answer set forth in the foregoing paragraphs.
- 519. The Answering Defendants deny the allegations contained in paragraph 519 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 520. The Answering Defendants deny the allegations contained in paragraph 520 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 521. The Answering Defendants deny the allegations contained in paragraph 521 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 522. The Answering Defendants deny the allegations contained in paragraph 522 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
  - 523. The Answering Defendants deny the allegations contained in paragraph 523

of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

- 524. The Answering Defendants deny the allegations contained in paragraph 524 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 525. The Answering Defendants incorporate, as though fully set forth herein, each and every answer set forth in the foregoing paragraphs.
- 526. The Answering Defendants deny the allegations contained in paragraph 526 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 527. The Answering Defendants deny the allegations contained in paragraph 527 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 528. The Answering Defendants deny the allegations contained in paragraph 528 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 529. The Answering Defendants deny the allegations contained in paragraph 529 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.
- 530. The Answering Defendants deny the allegations contained in paragraph 530 of the Plaintiffs' Complaint insofar as they relate or refer to the Answering Defendants. The Answering Defendants deny information sufficient to form a belief as to the balance of the allegations contained in this paragraph.

### **IURY DEMAND**

The Answering Defendant neither admits nor denies the statement as it is a jury demand.

#### FIRST AFFIRMATIVE DEFENSE

The Plaintiffs' Complaint fails to state a claim upon which relief may be granted.

### **SECOND AFFIRMATIVE DEFENSE**

The Plaintiffs' Complaint is barred by the Statute of Frauds.

## THIRD AFFIRMATIVE DEFENSE

The Plaintiffs' Complaint is barred by the Statute of Limitations.

### **FOURTH AFFIRMATIVE DEFENSE**

The Plaintiffs' Complaint is barred by the Statute of Repose.

### **FIFTH AFFIRMATIVE DEFENSE**

The Plaintiffs' Complaint is barred by the doctrine of laches.

## **SIXTH AFFIRMATIVE DEFENSE**

The Plaintiffs' Complaint is barred by the doctrine of unclean hands.

## **SEVENTH AFFIRMATIVE DEFENSE**

The Plaintiffs' Complaint is barred by the doctrine of equitable estoppel.

## **EIGHTH AFFIRMATIVE DEFENSE**

The Plaintiffs are barred by the doctrine of res judicata.

### **NINTH AFFIRMATIVE DEFENSE**

The Plaintiffs are barred by the doctrine of collateral estoppel.

### **TENTH AFFIRMATIVE DEFENSE**

The Plaintiffs are barred by the doctrine of claim preclusion.

### **ELEVENTH AFFIRMATIVE DEFENSE**

The Plaintiffs are barred by the doctrine of issue preclusion.

#### TWELFTH AFFIRMATIVE DEFENSE

The Plaintiffs are barred from recovery for lack of privity.

### **THIRTEENTH AFFIRMATIVE DEFENSE**

The Plaintiffs are barred from recovery as they have failed to satisfy a necessary jurisdictional prerequisite.

#### FOURTEENTH AFFIRMATIVE DEFENSE

The Plaintiffs are barred from recovery by the doctrine of waiver.

## **FIFTEENTH AFFIRMATIVE DEFENSE**

The Plaintiffs are barred from recovery by the doctrine of offer and compromise.

#### **SIXTEENTH AFFIRMATIVE DEFENSE**

The Plaintiffs are barred from recovery as they have failed to comply with the rules and regulations of the State of New York pertaining to no-fault insurance coverage.

### **SEVENTEENTH AFFIRMATIVE DEFENSE**

The Plaintiffs are barred from recovery as any damages suffered have been recouped through subrogation.

## **EIGHTEENTH AFFIRMATIVE DEFENSE**

The Plaintiffs are barred from recovery as any damages suffered have been passed through to insureds through the adjustment of insurance rates as reported to the New York Insurance Department.

#### NINETEENTH AFFIRMATIVE DEFENSE

The Plaintiffs cannot seek a Declaratory Judgment against the professional corporation as there is existing arbitration and litigation. The professional corporation's right to choose forum under the NY No-fault Rules and Regulation cannot be abrogated by the Plaintiff instituting this action.

### **TWENTIETH AFFIRMATIVE DEFENSE**

Plaintiffs have not satisfied their burden to reverse, modify or amend arbitration rulings as required under the New York Alternative Procedure for Dispute Resolution Act, or the New York Arbitration Act

#### **TWENTY-FIRST AFFIRMATIVE DEFENSE**

The Plaintiffs cannot seek a Declaratory Judgment against the professional corporation as there is existing arbitration and litigation. The professional corporation's right to choose forum under the NY No-fault Rules and Regulation cannot be abrogated by the Plaintiff instituting this action.

#### TWENTY-SECOND AFFIRMATIVE DEFENSE

The Plaintiffs are barred from recovering any sums which were paid as a result of Judgments or Arbitration Awards.

# **DEFENDANT DEMAND A TRIAL BY JURY**

Dated: April 10, 2024

Garden City, New York

SCHWARTZ, CONROY & HACK, PC

Attorneys for Defendants

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